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To: govt@eaa.org
Subject: Comments to NPRM No. FAA-2001-11133, Certification of Pilots, Aircraft and Repairmen for the Operation of Light Sport Aircraft

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Comments: Comment on NPRM No. FAA-2001-11133, Certification of Pilots, Aircraft and Repairmen for the Operation of Light Sport Aircraft

Dear Sirs,

Thank you very much for the excellent proposal, the hard work and thought are evident.

The following is my comment on the Sport Pilot NPRM. I will address by section and hope to convey my earnest concerns.

14 CFR Part 1

A light-sport aircraft would have a maximum speed in level flight with maximum continuous power (VH) of 115 knots. This limits the commanded kinetic energy of an aircraft flown by a pilot holding a sport pilot certificate.

And

Section 1.1 General definitions.

2. A maximum airspeed in level flight with maximum continuous power (VH) of 115 knots CAS under standard atmospheric conditions;

Comment:

As stated in the NPRM the some primary reasons for the new proposal is as quote: "This action is necessary to address advances in sport and recreational aviation technology" and "New advancements in technology have improved safety, including light-engine technology and reliability, more effective application of low-speed aerodynamic principles, and new materials" and "The FAA is proposing this rule to increase safety in the light-sport aircraft community by closing the gaps in existing regulations and accommodating new advances in technology" unquote, also stating that the rules were out of date.

I can only imagine how many of these advancements would not exist if the rules for existing experimental airplanes would have contained the extremely limiting language proposed in item two of this definition. I am sure there were no Lancairs or Expresses or Velocitys or any of the fast glass ships that exist today or any of the clean RV designs that we see leading the world in aviation today if the door was not left open to encourage development.

The evolution in design is always to expand upward, outward and expand the envelope, not downward, backward and compress the envelope.

As you stated, The FAA recognizes that this limitation (VS1=44kts), would limit the maximum speed of the aircraft and It is also consistent with foreign airworthiness standards for similar performance aircraft.

I am in touch with foreign aviation enthusiasts in countries with similar airworthiness standards and they do not contain the limiting language seen in item two of this proposal. The designers and builders of sport type aircraft have the similar restrictions in all aspects of this proposal except limiting top or cruise speed. As you state if the other aspects are met then necessarily the top speeds are limited. However, they still have the challenge of building greater speed and efficiency while maintaining the good flying characteristics of slow speed flight in the critical areas of operations.

(Considering the global economy how will we be able to compete with the unfettered nations to design and build better airplanes while complying with their own standards.)?

Training consists of .5% trimming for straight and level and 99.5% operations take offs and landings. Have NTSB reported many accidents would be avoided if a pilot trims for cruise at 110kts rather than 115kts.

One of the concerns listed in this proposal pertaining to the maximum speed is the commanded kinetic energy of an aircraft flown by a pilot holding a sport pilot certificate. Considering: A. This person has a driver's license. B. This person drives an average size automobile. C. This person drives the established speed limits D. No laws of physics have been repealed, then this person commands about twice as much kinetic energy and a whole lot closer proximity to hard things driving home after the flight than he ever would during the flight even "IF" this speed limitation were removed.

In summation,

1. The Stall speed limitation will limit the high end of the envelope making a stated, locked in envelope boundary unnecessary.
2. Other nations do not have this limitation.
3. Safety would not be enhanced because this is not the accident end of the envelope.
4. The commanded kinetic energy concern is not valid.

I hope you will delete this limitation from the definition for Light Sport Aircraft.

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